

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA	*	CASE NO. 4:18CR624
Plaintiff	*	
-vs-	*	JUDGE JOHN R. ADAMS
TERRELL D. HALL	*	
Defendant	*	<u>MOTION FOR CONTINUANCE</u>
	*	<u>OF SENTENCING HEARING</u>
	* * *	

Now comes the Defendant, Terrell D. Hall, by and through undersigned counsel, and respectfully moves this Court for a continuance of the sentencing presently scheduled for April 25, 2019, at 10:00 a.m. For cause, counsel commenced an Aggravated Murder trial before Judge Donofrio in the Mahoning County Common Pleas Court in *State of Ohio v Dashonti Baker*, 17 CR 720, on Monday, April 15, 2019. There were many irregularities including the eleventh-hour plea of the co-Defendant. The plea caused a recess of one and one-half days and prolonged jury selection for three days. Testimony of the 34 state's witnesses began on Thursday and as of Friday, April 19, 2019, only 4 witnesses had testified. Counsel is concerned either trial will still be in session and/or the jury deliberating on April 25, 2019.

WHEREFORE, Counsel respectfully requests that the sentencing scheduled for April 25, 2019, be continued and rescheduled according to the regular docket of this Court.

Respectfully submitted,

/S/ WALTER T. MADISON
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PROOF OF SERVICE

I hereby certify that on April 19, 2019, a copy of the foregoing Motion for Continuance of Sentencing Hearing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/S/ WALTER T. MADISON
WALTER T. MADISON
Attorney for Defendant